

July 22, 2008

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To Whom It May Concern:

The Farm Credit Administration (FCA) has issued a proposed regulation entitled "Rural Community Investments" which, if adopted, will allow the Farm Credit System to make virtually any type of non-farm loan. FCA's tactic is that FCS would simply have to label the loans "investments" and FCA would consider them legal. Unlike Fannie Mae or Freddie Mac, the FCS competes against community banks at the retail level, utilizing their privileged tax and funding advantages to cherry-pick banks' best loans. Adopting this proposal would allow FCS lenders to steal virtually any loan on the books of community banks in cities under 50,000.

I am opposed to this legislation, no doubt is it intended to increase the FCS revenue. But at a time when the banking industry is facing the sub-prime crisis; this legislation could further hurt struggling regional and community banks. The type of loans the FCA is proposing would not just be for investment, but would likely include consumer, business, and R/E loans that would be better financed by community banks and credit unions. Please weigh the negative impact this could have on struggling community banks and also the possibility that non-farm loans would be financed through the Farm Credit System and improperly labeled as investment when they should be labeled and monitored as consumer or commercial loans.

Thank you for your consideration.

Sincerely,

Chris lames

Commercial Loan Officer

Chris James

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